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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

**-oOo-**

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	2:12-mj-00212-PAL
	)	
vs	)	
	)	
KEYUNNA LATRESS JOHNSON,	)	<b><u>STIPULATION TO CONTINUE</u></b>
	)	<b><u>PRELIMINARY HEARING</u></b>
Defendant.	)	(Seventh Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Russell Marsh and Amber Craig, Assistant United States Attorneys, counsel for the United States of America, and Derrick Penney, Esq., counsel for Defendant Keyunna Latress Johnson, that the Preliminary Hearing in this matter currently scheduled for October 30, 2012, at the hour of 4:00 p.m., be vacated and set to a date and time to be set by this court; however, no earlier than thirty (30) days.

This Stipulation is being entered into for the following reasons:

1. The Defendant signed a pre-indictment plea agreement which was sent to the court clerk to have a district court criminal case number assigned and an arraignment and entry of plea hearing set. One additional document (waiver of indictment) must be signed by the Defendant before the criminal case can be opened. The parties respectfully request additional time to allow defense counsel to meet with Defendant and have her sign the waiver.

- 1                   2.     The parties agree to the continuance.
- 2                   3.     The defendant is out of custody and does not object to the continuance.
- 3                   4.     The additional time requested herein is not sought for purposes of delay, but
- 4 merely to allow the parties sufficient time within which to finalize negotiations and to allow
- 5 defense counsel to become familiar with the discovery.

6                   This is the seventh request to continue the preliminary hearing filed herein.

7                   Dated this 29th day of October, 2012.

8                                   Respectfully Submitted,

9                                   DANIEL G. BOGDEN  
10                                  United States Attorney

11                   /s/ Russell Marsh

12                   \_\_\_\_\_  
13                   RUSSELL MARSH  
14                   Assistant United States Attorney  
15                   AMBER M. CRAIG  
16                   Assistant United States Attorney

                                 /s/ Derrick Penney

                                 \_\_\_\_\_  
                                 DERRICK PENNEY, ESQ.  
                                 Counsel for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**-oOo-**

UNITED STATES OF AMERICA

Plaintiff,

vs

KEYUNNA LATRESS JOHNSON,

Defendant.

2:12-mj-00212-PAL

**ORDER**

Based on the Stipulation of counsel and good cause appearing,

**IT IS THEREFORE ORDERED** that the Preliminary Hearing currently  
scheduled on October 30, 2012, at the hour of 4:00 p.m., be vacated and continued to

\_\_\_\_\_ at the hour of \_\_\_\_:\_\_\_\_.m.

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE